1 CHARLES LA BELLA Deputy Chief 2 THOMAS B. W. HALL ALISON L. ANDERSON 3 Trial Attornevs Fraud Section, Criminal Division U.S. Department of Justice 1400 New York Avenue, NW Washington, DC 20530 5 (202) 616-1682 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA -oOo-8 9 UNITED STATES OF AMERICA CRIMINAL NO. 2:14CR388-JCM-GWF 10 v. 11 GOVERNMENT'S UNOPPOSED MOTION TO GRANT DEFENSE 12 **COUNSEL ACCESS TO** STEPHANIE LIANE MARKHAM, RELATED DISCOVERY 13 Defendant. 14 15 The United States respectfully moves to grant defense counsel in this case, Mark B. 16 Bailus, access to the discovery that the Government has provided in the related case, *United* States v. Benzer, et al, Case No. 2:13-cr-18-JCM-GWF, by granting defense counsel access via 17 the process provided by Russell M Aoki, Coordinating Discovery Attorney, in that case. 18 Although the Government has separately produced discovery that is directly relevant (or 19 the "hot docs") to the above captioned case and defendant, the materials produced in the *Benzer* 20 case are also relevant to the charges that the Defendant faces. To separately produce these 21 materials outside of Mr. Aoki's system would be onerous on both the Government and defense counsel, who is appointed in this case. 22 23 DATED this 26th day of January, 2015. 24

WILLIAM STELLMACH Acting Chief, U.S. Department of Justice Fraud Section, Criminal Division /s/ Alison L. Anderson ALISON L. ANDERSON Trial Attorney, U.S. Dept. of Justice Criminal Division, Fraud Section

1	UNITED STATES DISTRICT COURT
2	DISTRICT OF NEVADA
3	-oOo-
4	UNITED STATES OF AMERICA) CRIMINAL NO. 2:14CR388-JCM-GWF
5	v.) CERTIFICATE OF SERVICE
67	STEPHANIE LIANE MARKHAM,)
8	Defendant.)
10	I, the undersigned, hereby certify that this pleading was filed with the clerk of court via
11	ECF and will be served electronically via ECF on all parties that have entered their appearances
12	in this case.
13 14	Dated: January 26, 2015
15	WILLIAM STELLMACH
16	Acting Chief, U.S. Department of Justice Fraud Section, Criminal Division
17	/s/ Alison L. Anderson
18	ALISON L. ANDERSON
19	Trial Attorney, U.S. Dept. of Justice Criminal Division, Fraud Section
20	
21	
22	
23	
24	

1	
2	UNITED STATES DISTRICT COURT
3	DISTRICT OF NEVADA -oOo-
4	
5	UNITED STATES OF AMERICA) CRIMINAL NO. 2:14CR388-JCM-GWF
6	v.)
7	
8	STEPHANIE LIANE MARKHAM,)
9	Defendant.
10	
11	[PROPOSED] ORDER
12	Based on the Government's Unopposed Motion to Grant Defense Counsel Access to
13	Related Discovery (Doc. No. 13), it is hereby ORDERED that Mark B. Bailus, counsel for
14	Defendant Stephanie Liane Markham, be granted access to Russell M. Aoki's system containing
15	the discovery materials provided by the Government in the related case, <i>United States v. Benzer</i>
16	et al, Case No. 2:13-cr-18-JCM-GWF.
17	
18	IT IS SO ORDERED this27thday ofJanuary,2015.
	IT IS SO ORDERED this day of day of 2015.
19	
20	4. 40
21	GEORGE FOLEY, JR
22	United States Magistrate Judge
23	
, I	